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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Sarah Burrow <Sarah.Burrow@arun.gov.uk>
Sent: 28 October 2021 12:40
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/201/21/PL

Engineers Comments Regarding Surface Water Drainage

Despite a holding objection on application BR/176/20/PL no further information or site investigations have been provided to support this new application. Therefore my previous comments remain unchanged:

Surface water drainage must be considered at the earliest opportunity. Without winter groundwater monitoring and winter infiltration testing there is no way of determining the area take up required for an infiltrating surface water drainage solution and the hierarchy for sustainable drainage must be followed. If infiltration is viable on the site then lack of space is not an adequate excuse for not utilising soakaways/infiltration structures. Soakaways must be located a minimum of 5m from any buildings, and 2.5m from the site boundaries. Given these constraints, I do not see how surface water from the site can be sustainably drained within the remaining space on the site. There is also the risk that the proposed building may be located on the site of any drainage features for the existing building.

Therefore, I wish to lodge a holding objection to the application.

If there are no watercourses nearby:

To overcome my objection the applicant should complete winter groundwater monitoring and winter infiltration testing and complete calculations to assess the size of structures required. A rough plan should be formed showing where these structures can be provided within the proposed layout. Detailed design of the system can be left until discharge of conditions where the applicant should provide the level of information stated within our checklist <https://www.arun.gov.uk/drainagechecklist>.

However, if you are minded to approve the application please ensure the following conditions are applied:

PCENG D2

“Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.”

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

And the accompanying informative:

INFORM D

“Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers.

Supplementary guidance notes regarding surface water drainage are located here

<https://www.arun.gov.uk/surfacewater> on Arun District Councils website. A surface water drainage checklist is available on Arun District Councils website, this should be submitted with a Discharge of Conditions Application.”

Kind Regards

Sarah Burrow
Engineering Assistant, Engineering Services

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Current working pattern: Monday-Wednesday 8am-2:30pm, Thursday 8am-5pm, Friday 8am-11:30am.

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 23 September 2021 10:04

To: Land Drainage <Land.Drainage@arun.gov.uk>

Subject: Planning Consultation on: BR/201/21/PL

To: **Engineers (Drainage)**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: BR/201/21/PL

Registered: 21st September 2021

Site Address: Ravenna Richmond Avenue West Bognor Regis PO21 2YG

Grid Reference: 492398 99034

Description of Works: Erection of a new building comprising of 3 No apartments (2 No 2 bed units & 1 No 1 bed unit), including alterations to the fenestration of the existing building (resubmission following BR/176/20/PL). This site is in CIL Zone 4 (Zero Rated) as flats.

The Council have received the above application.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 28th October 2021. You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can information on what comments we can consider

<https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Maria Tomalova

Planning Officer- Arun District Council

Telephone: 01903 737510

Email: maria.tomalova@arun.gov.uk

PLCONSULT (CDB) 2020